

Exhibit 1

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

JONES et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC et al.,

Defendants.

Civ. Action No. 2:20-cv-02892

**RESPONSES AND OBJECTIONS OF DEFENDANT BAIN CAPITAL PRIVATE
EQUITY TO PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Defendant Bain Capital Private Equity (“Bain”) hereby responds and objects to Plaintiffs’ First Set of Interrogatories.

OBJECTIONS TO DEFINITIONS

1. Bain notes that the vast majority of the terms purportedly defined in the “Definitions” (other than “You” and “state”) are not used in the interrogatories and Bain will therefore disregard them.
2. Bain objects to the term “You” in Definition 8 to the extent it seeks to include any person or entity beyond Bain. Where “You” appear in the requests, Bain will interpret the term to mean Bain.

OBJECTIONS TO INSTRUCTIONS

1. Bain objects to the Instructions to the extent Plaintiffs seek to impose any obligation on Bain beyond that required by the Federal Rules of Civil Procedure. Bain will respond in accordance with the Federal Rules of Civil Procedure and will otherwise disregard the Instructions.

2. Bain objects to the time period contained in Instruction 7 and the embedded definition of “Relevant Time Period” as overly broad and unduly burdensome, and inconsistent with the Court’s previous rulings in this matter. To the extent Bain responds to these requests, Bain will only do so for the period June 30, 2017 to June 30, 2020.

OBJECTIONS AND RESPONSES TO REQUESTS

The above objections are explicitly incorporated by reference to each of the following responses as if they were set forth in full in each individual response.

Interrogatory No. 1: State each affirmative defense to the claims against You.

Objection and Response to Interrogatory No. 1: Bain objects to Interrogatory 1 as seeking information that Bain is not required to provide prior to filing an answer in this case. Bain will identify its affirmative defenses when an answer is required under the Federal Rules of Civil Procedure.

Interrogatory No. 2: State each fact which supports each affirmative defense stated in response to Interrogatory No. 1.

Objection and Response to Interrogatory No. 2: Bain objects to Interrogatory 2 as seeking information that Bain is not required to provide prior to filing an answer in this case, and as seeking attorney work product. Bain will identify the facts supporting its affirmative defenses if, when, and to the extent it is required to do so under the Federal Rules of Civil Procedure.

Dated: April 4, 2022

/s Steven J. Kaiser

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